

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BARBARA STROUGO, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff(s),

V.

BARCLAYS PLC, BOB DIAMOND,
ANTONY JENKINS, CHRIS LUCAS and
TUSHAR MORZARIA,

Defendants.

Case No. 1:14-cv-05797-SAS

CLASS ACTION

DEMAND FOR JURY TRIAL

**DECLARATION OF JEREMY A. LIEBERMAN IN SUPPORT OF
THE MOTION BY MOHIT SAHNI FOR APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF COUNSEL**

I, Jeremy A. Lieberman, declare:

1. I am an attorney with the law firm of Pomerantz LLP [Proposed] Lead Counsel in this action and have personal knowledge of the facts set forth herein. I make this Declaration in support of the motion of Mohit Sahni (“Movant”) for Appointment as Lead Plaintiff, and for approval Counsel.

2. Attached hereto as the exhibits indicated are true and correct copies of the following:

Exhibit A: PSLRA Early Notice;

Exhibit B: PSLRA certification of Movant;

Exhibit C: Movant’s loss chart

Exhibit D: Firm resume of Pomerantz LLP

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed this 26th day of September, 2014, in New York, New York.

/s/ Jeremy A. Lieberman
Jeremy A. Lieberman